

**IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF NEW MEXICO**

**UNITED STATES OF AMERICA,**  
  
**PLAINTIFF,**  
  
**V.**  
  
**BILL JONES A/K/A CHARLES**  
  
**JOHNSTON,**  
  
**DEFENDANT.**

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**No: CR 05-1849 (JH)**

**UNOPPOSED MOTION TO  
RESET SENTENCING HEARING  
CURRENTLY SET FOR APRIL  
23, 2009**

**DEFENDANT'S UNOPPOSED MOTION TO RESET SENTENCING HEARING  
SET FOR APRIL 23, 2009**

**COMES NOW**, D. Chipman "Chip" Venie, and THE LAW OFFICE OF  
CHIP VENIE, AND Moves this Court to re set the sentencing currently set for  
April 23, 2009.

As grounds for this Motion, defendant states as follows:

1. The Government's representative in this case, James Braun, is not opposed to this Motion.
2. As per the plea agreement, Mr. Jones is going to get a time served sentence and three years of supervised release.
3. On the date and time currently set for this sentencing, undersigned counsel has mandatory CLE in Santa Fe. This CLE is being held at the Spring National conference for the National Association of Criminal Defense Lawyers.

4. The defendant, Mr. Jones is out of custody. He has remained in weekly contact with the office of undersigned counsel.

**WHEREFORE**, Defendant prays for this Court grant his **MOTION TO RESET SENTENCING CURRENTLY SET FOR APRIL 23, 2009.**

Respectfully submitted,

THE LAW OFFICE OF CHIP VENIE



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**D. Chipman Venie, Esq.**  
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Attorneys for Defendant:  
**BILL JONES**

### CERTIFICATE OF SERVICE BY ATTORNEY

I certify that I caused a copy of this Motion to be served by hand delivery on the following persons or entities by delivery on this 20<sup>TH</sup> day of April 2009.

Mr. James Braun  
United States Attorneys Office  
PO Box 607  
Albuquerque, New Mexico 87103

BY: Attorney, D. Chipman Venie

  
\_\_\_\_\_  
Signature

4/20/09  
\_\_\_\_\_  
Date of signature